

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATION BOARD  
WASHINGTON D.C.**

REMINGTON LODGING &  
HOSPITALITY, LLC D/B/A HYATT  
REGENCY-WIND WATCH, A SINGLE  
EMPLOYER WITH HHC TRS FP  
PORTFOLIO, LLC, A SUBSIDIARY OF  
ASHFORD HOSPITALITY TRUST, INC.

and

Case 29-CA-093850  
29-CA-095876

LOCAL 947, UNITED SERVICE  
WORKERS UNION, INTERNATIONAL  
UNION OF JOURNEYMEN AND ALLIED  
TRADES

**RESPONDENT’S MOTION TO DISMISS**

Respondent respectfully brings this motion to dismiss the Motion for Partial Summary Judgment filed by Counsel for the General Counsel on August 2, 2018. Respondent brings this motion on the grounds that Counsel for the General Counsel filed the Motion for Partial Summary Judgment with Division of Judges, rather than the Board, as required by Section 102.24(a) of National Labor Relations Board Rules and Regulations – Part 102, as amended. Section 102.24(a) provides that: “All motions for . . . summary judgment . . . made prior to the hearing must be filed in writing with the Board pursuant to the provisions of §102.50.” As such, Counsel for the General Counsel’s Motion for Partial Summary Judgment was improperly filed and should be dismissed.

Respectfully submitted, this 16th day of August 2018.

/s/ Jacqueline A. Godoy

Karl Terrell

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*Attorneys for Respondent*

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**PROOF OF SERVICE**

I am employed in the County of San Diego, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 600 West Broadway, Suite 910, San Diego, CA 92101.

On August 16, 2018, I caused the following document(s) to be served: **RESPONDENT'S MOTION TO DISMISS** on the interested party below in this action by filing the enclosed

- ☒ BY THE NLRB'S ELECTRONIC FILING SYSTEM on its website:  
<http://www.nlr.gov>, Executive Secretary, Washington, D.C.
- ☒ BY ELECTRONIC MAIL to: Kathy.king@nlrb.gov;  
John.Craner@css-pc.com; Aggie.Kapelman@nlrb.gov
- ☐ BY EXPRESS MAIL: I caused said document(s) to be deposited in a box or other facility regularly maintained by the express service carrier providing overnight delivery pursuant to Code of Civil Procedure Section 1013(c).

Executed on August 16, 2018, at San Diego, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



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Perla D. Cuevas  
STOKES WAGNER  
600 West Broadway, Suite 910  
San Diego, CA 92101